UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 15-10145-RGS
)	
)	
TEVIN ABERCROMBIE)	
)	

DEFENDANT'S MOTION TO REMOVE THE SUPERVISED RELEASE CONDITION PERTAINING TO LOCATION MONITORING AND CURFEW

Now comes the Defendant, TEVIN ABERCROMBIE, and requests that this Honorable Court remove the previously imposed supervised release condition pertaining to location monitoring and the curfew.

As grounds for this request, the Defendant respectfully says:

- Mr. Abercrombie's U.S. Probation Officer, Justin Prophet, is in favor of the requested removal of the location monitoring and curfew conditions of Mr. Abercrombie's supervised release.
- 2. Mr. Abercrombie is temporarily residing at the home of his grandmother in the Roxbury section of Boston, Massachusetts.
- 3. The impetus for this supervised release violation an argument and altercation between Mr. Abercrombie and his sister resulted in charges being filed in the Massachusetts District Court system and that case has been further continued to January 23, 2020. A restraining order previously issued to Mr. Abercrombie's sister (as the alleged victim of the pending charged offenses) expired in the absence of an application for renewal.

4. Mr. Abercrombie continues to search for employment and is also working with applicable social services agencies in an effort to locate work. The removal of the location monitoring and curfew conditions of release would enhance Mr. Abercrombie's employability and availability for work.

WHEREFORE, the Defendant, Tevin Abercrombie, respectfully requests removal of the location monitoring and curfew conditions of the supervised release term imposed upon him.

Respectfully submitted, **TEVIN ABERCROMBIE** By his attorney,

/s/ George F. Gormley

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Date: November 21, 2019

CERTIFICATE OF SERVICES

I hereby certify that this document filed through the ECF system will be sent to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ George F. Gormley
George F. Gormley